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June 25, 2025

**BY ECF**

Honorable Joseph A. Marutollo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Lynch v. DOE, et al., No. 24-CV-7795 (DG)(JAM)

Dear Magistrate Judge Marutollo:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and I am Assistant Corporation Counsel Ilona Ehrlich's supervisor. Ms. Ehrlich is the attorney of record for Defendants Department of Education of the City of New York, David Banks, and Katherine Rodi in the above-referenced matter. I write to respectfully request an extension of time, from June 26, 2025 until July 14, 2025, for Defendants to file their reply to their motion to dismiss. This is Defendants' first request for an extension to file their reply. Plaintiff does not consent for the reasons set forth in the attached letter, which Plaintiff submitted to me by email in response to my inquiry as to whether she would consent. The requested extension does not affect any other deadlines in this matter.

The reason for this request is that Ms. Ehrlich has been traveling on her honeymoon since June 16, 2025, and will be away from the office through June 30, 2025. Plaintiff filed her opposition on June 12, 2025, and the requested extension will permit Ms. Ehrlich sufficient time to reply upon her return to the office.

Consistent with Your Honor's Individual Rule III, I intend to call Chambers after filing this motion to advise the Court that it has been filed. I also apologize to the Court and Plaintiff that this motion was not filed two days before Defendants' reply was due; however, and respectfully, neither the requested extension nor its timing will cause any prejudice to Plaintiff, as she has already filed her opposition and discovery was not stayed pending resolution of the motion.

I thank the Court for its consideration herein.

Respectfully submitted,

/s/ Christopher G. Arko

Senior Counsel

Labor and Employment Law Division